



April 28, 2020

**SUBMITTED ONLINE AT FOIAONLINE.GOV**

Regional Freedom of Information Officer

U.S. EPA, Region 5

77 West Jackson Boulevard (MI-10J)

Chicago, IL 60604-3590

(312) 886-6803

**RE: FOIA REQUEST**

Dear Sir or Madam:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. Section 552 *et seq.*, we request copies of any and all records, **for the period beginning January 1, 2015 through the present**, pertaining to the following employers:

- **Pioneer Hi-Bred International, Inc.**
- **Pioneer Hi-Bred**
- **Pioneer**
- **Corteva**
- **Corteva Agriscience**
- **DowDuPont**
- **DuPont Pioneer**
- **DuPont**
- **Fidencio Salinas, Jr.**

Please send all corresponding documents in your possession regarding the above-named employers, including, but not limited to, any investigation documents, transmittal letters, and narrative reports, including the following:

- Any and all Worker Protection Standard complaints, communications, or investigations against the above referenced employers.
- Any and all Safety Data Sheets for chemical exposure incidents, if any;
- Pesticide misuse complaints against the above referenced employers;
- Pesticide exposure complaints against the above referenced employers;
- Chemical exposure complaints against the above referenced employers
- Any other related documentation or complaint in the possession of the Environmental Protection Agency relating to pesticide exposure that references the above referenced employers.

**Please include with your response a certification by the custodian of records or another person authorized to make the certification that the documents are true copies of documents in the official custody of the U.S. Environmental Protection Agency (EPA).**

Please provide us with certified *electronic copies* of any responsive documents in their native format or in the format in which they are maintained for regular business use. Please send copies of the front and back of all documents, if information is contained on both sides of the document, and all attachments. If no responsive documents are found, please so certify in writing. You may provide documents on a CD-ROM if available and feasible or by email to [ccisnerosvilchis@legalaidchicago.org](mailto:ccisnerosvilchis@legalaidchicago.org) rather than mailing photocopies. If no responsive documents are found, please so certify in writing. If any part of this request is denied, please describe in detail the material that was not provided and specify the statutory basis for the denial.

If any documents you find are related to an active investigation or will otherwise delay your response to this request, please contact us so that we can appropriately narrow our request. If otherwise narrowing our request will expedite your response time to this request, we are happy to discuss narrowing our request.

I request a waiver of all fees for this request. Disclosure of the requested information to me is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in my commercial interest. Legal Aid Chicago, formerly LAF (Legal Assistance Foundation), is a non-profit legal services law firm established to provide free legal services to people in poverty and is funded by the federal government (through the Legal Services Corporation, see [www.lsc.gov](http://www.lsc.gov)). This information concerns the operations and activities of the EPA. The information received will be useful in understanding and providing advice to agricultural workers on their rights in a WPS investigation of their workplace, the procedure that an agricultural worker can use to file complaints against their employer for pesticide misuse if they have any, if their employer has been the subject of previous complaints, and whether the agricultural workers' work environment or field operations have been deemed safe or unsafe by the EPA. As a result, this information is likely to contribute to the public understanding of EPA operations and activities as it relates to the safety and rights of agricultural workers in Central Illinois. Lastly, as mentioned above, Legal Aid Chicago is a nonprofit legal aid organization that provides assistance to migrant and seasonal agricultural workers in Illinois. Any information received by this request will not be used for profit and the information will not have a commercial purpose. If your office decides that fees cannot be waived, we should minimally be categorized pursuant to 40 C.F.R. § 2.107(c)(1)(iv) in the "all other requests" category because, as a nonprofit legal aid organization, we do not commercially profit from our representation of indigent migrant workers. If your office decides that fees cannot be waived, please contact me before proceeding if charges are estimated to exceed fifty dollars (\$50).

Please note that a response to this request is due within twenty (20) days of your receiving it. 5 USC § 552 (a)(6)(A)(i). Please submit your FOIA response to me either via fax to 312.431.2290, email to [ccisnerosvilchis@legalaidchicago.org](mailto:ccisnerosvilchis@legalaidchicago.org), or via mail to: Carlos Cisneros-Vilchis, Legal Aid Chicago, 120 S. LaSalle, Suite 900, Chicago, IL 60603.

Your attention to this matter is greatly appreciated. Thank you.

Sincerely,

Carlos Cisneros-Vilchis  
Staff Attorney  
Illinois Migrant Legal Assistance Project of Legal Aid Chicago  
[ccisnerosvilchis@legalaidchicago.org](mailto:ccisnerosvilchis@legalaidchicago.org)  
312-229-6090